

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: :  
MOTORS LIQUIDATION COMPANY, *et al.*, : Case Nos.: 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
: (Jointly Administered)  
Debtors. :  
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**STIPULATION AND ORDER REGARDING RESPONSE DATE FOR  
PLEADINGS FILED BY THE BLEDSOE PLAINTIFFS ON JUNE 11, 2015**

General Motors LLC (“**New GM**”) and Sharon Bledsoe, *et al.* (“**Bledsoe Plaintiffs**”), by  
and through their undersigned counsel, enter into this Stipulation and Agreed Order and state:

WHEREAS, on June 11, 2015, the Bledsoe Plaintiffs filed with the United States  
Bankruptcy Court for the Southern District of New York (“**Bankruptcy Court**”) the *Bledsoe  
Plaintiffs’ Motion To Amend Findings Pursuant To FRBP 7052, For Reargument Pursuant To  
Local Bankruptcy Rule 9023.1, To Alter Or Amend The Judgment Pursuant To FRBP 9023, And  
For Relief From The Judgment Pursuant To FRBP 9024* (“**Motion to Amend**”) [Dkt. No.  
13196] and the accompanying *Bledsoe Plaintiffs’ Brief in Support of Their Motion for Relief  
Related to the Court’s Judgment of June 1, 2015, and No Stay/No Strike/Objection Pleading  
Pursuant to the Judgment* (“**Brief in Support**,” and with the Motion to Amend, the “**Bledsoe  
Pleadings**”);

WHEREAS, the Bledsoe Pleadings set forth a return date thereon of June 29, 2015  
 (“**Return Date**”);

WHEREAS, on June 1, 2015, the Bankruptcy Court entered a Judgment (“**Judgment**”)  
[Dkt. No. 13177] in connection with the Bankruptcy Court’s *Decision on Motion to Enforce Sale  
Order*, dated April 15, 2015 [Dkt. No. 13109];

WHEREAS, pursuant to provisions contained in the Judgment, New GM has 17 business days to respond to any No Stay Pleading, No Strike Pleading and/or Objection Pleading (each term as defined in the Judgment); and

WHEREAS, the Parties have agreed to a date by which New GM will respond to the Bledsoe Pleadings.

NOW, THEREFORE, it is stipulated and agreed, by and among the Parties, subject to approval of the Bankruptcy Court, that:

1. The deadline for New GM to respond to the Bledsoe Pleadings is July 6, 2015.
2. The Return Date shall be deemed stricken from the Bledsoe Pleadings, and the Bankruptcy Court shall schedule a hearing date on the Bledsoe Pleadings and any responses thereto after same are filed if it believes one is necessary.
3. This Stipulation and Order may be executed in one or more counterparts, each of which is deemed an original, together constituting one and the same document. Facsimile signatures or signatures received via e-mail transmission are treated as a binding and original document, and the facsimile signature or e-mail signature of any party is considered an original signature.

Dated: New York, New York  
June 12, 2014

<u>/s/ Scott Davidson</u> Arthur Steinberg Scott Davidson KING & SPALDING LLP 1185 Avenue of the Americas New York, NY 10036 (212) 556-2100  -and-	<u>/s/ Gary Peller</u> Gary Peller 600 New Jersey Avenue, N.W. Washington, D.C. 20001 (202) 662-9122  <i>Counsel to the Bledsoe Plaintiffs</i>
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KIRKLAND & ELLIS LLP 200 North LaSalle Chicago, Illinois 60654 (312) 862-2000 Richard C. Godfrey, P.C. Andrew B. Bloomer, P.C.  <i>Counsel to General Motors LLC</i>	
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**SO-ORDERED:**

Dated: New York, New York  
June 15, 2015

*s/Robert E. Gerber*  
HONORABLE ROBERT E. GERBER  
UNITED STATES BANKRUPTCY JUDGE